

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AMRIT KUMAR and TONY TEP,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

SAEXPLORATION HOLDINGS, INC., JEFF
HASTINGS, BRIAN BEATTY, BRENT
WHITELEY, L. MELVIN COOPER, GARY
DALTON, DAVID D. SGRO, GREGORY R.
MONAHAN, and MICHAEL FAUST,

Defendants.

CLASS ACTION

Case No. 4:19-cv-03089

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF THE PROPOSED CLASS
ACTION SETTLEMENT, PLAN OF ALLOCATION, AND CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Lead Plaintiffs Amrit Kumar and Tony Tep, by and through their attorneys, individually and on behalf of all others similarly situated, will and hereby do move this Court on August 12, 2021 at 9:00 a.m., the date and time previously set by the Honorable Andrew S. Hanen, United States District Court for the Southern District of Texas, 515 Rusk Avenue, Houston, Texas 77002 for an order: (i) finally approving the Proposed Class Action Settlement, (ii) finally approving the Plan of Allocation, and (iii) finally certifying the Proposed Settlement Class.

This motion is based on the accompanying: (i) Memorandum of Law in Support of Co-Lead Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Compensatory Award to Lead Plaintiffs; (ii) the Joint Declaration of Reed M. Kathrein and Philip Kim in Support of (1) Lead Plaintiffs' Motion for Final Approval of Proposed Class Action

Settlement, Plan of Allocation, and Class Certification; and (2) Lead Counsels' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Award to Lead Plaintiffs, and the exhibits attached thereto; and (iv) the pleadings and records on file in this action, including the Stipulation and Agreement of Settlement (ECF No. 90) and the exhibits thereto, and other such matters and argument as the Court may consider at the hearing on this motion.

Dated: June 1, 2020

Respectfully submitted,

STECKLER WAYNE COCHRAN PLLC

/s/ Stuart L. Cochran

Stuart L. Cochran
Texas Bar No. 24027936
Braden M. Wayne
Texas Bar No. 24075247
12720 Hillcrest Road, Suite 1045
Dallas, Texas 75219
Telephone: (972) 387-4040
Facsimile: (972) 387-4041
Email: stuart@swclaw.com
braden@swclaw.com

Co-Liaison Counsel for the Class

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim, Esq.
Laurence M. Rosen, Esq.
Brent J. LaPointe, Esq.
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com
Email: blapointe@rosenlegal.com

Co-Lead Counsel for the Class

HILLIARD MARTINEZ GONZALES LLP

/s/ Marion M. Reilly

Marion M. Reilly
John B. Martinez
719 South Shoreline, Suite 500
Corpus Christi, TX 78401
Telephone: (361) 882-1612
Facsimile: (361) 882-3015
marion@hmglawfirm.com
john@hmglawfirm.com

Co-Liaison Counsel for the Class

HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Reed R. Kathrein

Reed R. Kathrein
Danielle Smith
Lucas E. Gilmore
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
reed@hbsslaw.com
danielles@hbsslaw.com
lucasg@hbsslaw.com

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

Co-Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Stuart L. Cochran

Stuart L. Cochran